

EIGHTH: That your Complainants and their predecessors in title have physically and peacefully possessed Lot 8 in the Rhodes Addition to Knoxville for an uninterrupted period greatly in excess of 20 years prior to the filing of this Bill of Complaint; therefore, obtained a right to both equitable and legal title to said parcel.

NINTH: That your Complainants and their predecessor's in title have paid the taxes on and maintained actual, open, notorious, continuous, and hostile claim under color of title of Lot 8 for an uninterrupted period in excess of 20 years prior to the filing of this Bill of Complaint and therefore obtained a right to both equitable and legal title to said parcel.

TENTH: That your Complainants have made a thorough examination of the Frederick County tax records and there appears to have been no tax sale of Lot 8 Rhodes Addition to Knoxville.

ELEVENTH: That although the said Trustee's for the Benefit of Creditors, their heirs, successor's, substitutes, or assigns have not for a period of over 70 years made any claim of record to ownership of the subject property, the recorded Deed of Trust does constitute a cloud on the Complainant's adverse claim to title to Lot 8 of the Rhodes Addition to Knoxville.

TWELFTH: That although the said Creditors of James P. Biser, the heirs, successors, and assigns of the Creditors of James P. Biser, James P. Biser and the heirs, successors and assigns of James P. Biser, have not for a period of over 70 years made any claim to ownership of the subject property, their equitable interest does constitute a cloud on Complainants adverse claim to title to Lot 8 of the Rhodes Addition to Knoxville. Complainants have been unable to locate any of these parties.

WHEREFORE, your Complainant's pray the following relief:

1. That this Court assume jurisdiction over Lot 8 the Rhodes Addition to Knoxville.

2. That a Decree be passed granting your Complainant's absolute equitable title to the subject property.